From: Berg. Marlene
To: Tzhone, Stephen

Cc: <u>Poore, Christine</u>; <u>Crumbling, Deana</u>; <u>Bartenfelder, David</u>

Subject: RE: Minutes of Arkwood Meeting 4/29/15

Date: Wednesday, April 29, 2015 4:48:48 PM

Steve,

Please delete your first bullet. The unadjusted TEQ concentrations show that levels in the soil cover do not exceed 730 pg/g.

The ICs would be put into place for protectiveness w/r to direct contact.

And, the gw sampling would determine the protectiveness of the soil cover w/r of migration of soil dioxin to ground water.

Thanks, Marlene

From: Tzhone, Stephen

Sent: Wednesday, April 29, 2015 4:52 PM

To: Berg, Marlene

Cc: Poore, Christine; Crumbling, Deana; Bartenfelder, David

Subject: RE: Minutes of Arkwood Meeting 4/29/15

I just want to confirm that this demonstration (see highlight) would consist of these three parts:

- soil dioxin sampling of cover to ensure its below 730 ppt dioxin PRG
- gw dioxin sampling of possible pathways to ensure non-leaching and transport of dioxin
- ICs in place

Please clarify or confirm, thanks.

From: Berg, Marlene

Sent: Wednesday, April 29, 2015 3:32 PM

To: Tzhone, Stephen

Cc: Poore, Christine; Crumbling, Deana; Bartenfelder, David

Subject: Minutes of Arkwood Meeting 4/29/15

Steve T, Carlos, Chris V, Jon, Ghassan, and contract support

Marlene and Deana.

Ground water tracer study.

Region 6 has been working with Scott Huling from ORD/Ada who will be sending comments on tracer report.

Dave B is deferring to Ada.



Cleanup Levels

- We support calculation of 730 pg/g for a soil screening level for industrial use and 12,100 pg/g for maintenance worker.
- Maintenance worker for current land use, industrial for future land use. As we consider both current and future land use in determining protectiveness, we support the use of 730 pg/g as a soil screening level for the site.

Principal Threat Levels

- OSRTI will confirm with Region 6 that dioxin-contaminated soil beneath the soil cover does not constitute principal threat waste. This applies to toxicity of dioxin in soil, not mobility.
- PRP will need to demonstrate that 6 in soil cover can safely contain low-level waste w/r to direct contact and migration to ground water.

Site TEQ concentrations

- Deana has provided rationale for why unadjusted, not adjusted, TEQ concentrations is appropriate.
- Deana has provided additional comments for the PRP; these comments do not actually affect TEQ concentrations.

Soil Cover

Unadjusted TEQ concentrations are below 730 pg/g

Site areas beyond soil cover

• Unadjusted TEQ concentrations have been found above 730 pg/g for all DUs except DU for soil cover.

Beyond Site Boundary

- Unadjusted TEQ concentrations have been found above 730 pg/g from DU 5 and DU 7 which are beyond site boundary.
- Additional work will be needed to determine extent of contamination/risk beyond site boundary in addition to DU 5 and DU 7 areas.